

# Integrated Sustainability Appraisal (ISA) for the Monmouthshire Replacement Local Development Plan

**ISA Report accompanying the Deposit Plan - Non-Technical  
Summary**

Monmouthshire County Council

September 2024

Quality information

| Prepared by               | Checked by                          | Verified by             | Approved by             |
|---------------------------|-------------------------------------|-------------------------|-------------------------|
| EH: Environmental Planner | CB: Principal Environmental Planner | NCB: Technical Director | NCB: Technical Director |

Revision History

| Revision | Revision date  | Details              | Name | Position                        |
|----------|----------------|----------------------|------|---------------------------------|
| V1       | September 2024 | Final for submission | CB   | Principal Environmental Planner |
|          |                |                      |      |                                 |
|          |                |                      |      |                                 |
|          |                |                      |      |                                 |

Prepared for:  
 Monmouthshire County Council

Prepared by:  
 AECOM Limited  
 3rd Floor, Portwall Place  
 Portwall Lane  
 Bristol BS1 6NA  
 United Kingdom

T: +44 (117) 917 1200  
 aecom.com

© 2024 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

## Table of Contents

|  |    |
|--|----|
| Introduction.....  | 1  |
| 1. Introduction .....  | 2  |
| Part 1: What has plan-making/ ISA involved up to this point? ..... | 14 |
| 2. Plan-making/ ISA up to this point .....                         | 15 |
| 3. Developing the preferred strategy .....                         | 45 |
| Part 2: What are the ISA findings at this stage? .....             | 51 |
| 4. Appraisal findings at this stage .....                          | 52 |
| Part 3: What happens next? .....                                   | 55 |
| 5. Next steps and monitoring .....                                 | 56 |

# Introduction

# 1. Introduction

- 1.1 AECOM is commissioned to lead on Integrated Sustainability Appraisal (ISA) in support of Monmouthshire County Council's Replacement Local Development Plan (RLDP). ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WCFG).
- 1.2 ISA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts. Through this approach, the ISA for the RLDP seeks to maximise the developing plan's contribution to sustainable development.
- 1.3 As identified above, the ISA seeks to fulfil the requirements and duties for SA, SEA, EqIA, HIA, WLIA and WCFG. The approach is to fully integrate these components to provide a single assessment process to inform the development of the RLDP. A description of each of the various components and their purposes is provided below.
- 1.4 The ISA Report<sup>1</sup> and this NTS are published alongside the Deposit Plan. They lead on from the Initial ISA Report published in November 2022, taking into consideration feedback from consultation and the subsequent updates to the RLDP. Any representations received will be considered when the Plan is finalised for submission.
- 1.5 ISA reporting essentially involves answering the following questions in turn:
  - What has plan-making/ ISA involved up to this point?
    - Including in relation to 'reasonable alternatives'.
  - What are the appraisal findings at this current stage?
    - i.e. in relation to the Deposit Plan.
  - What happens next?
    - What steps will be taken to finalise (and monitor) the plan?
- 1.6 Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the questions i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

## What is the RLDP seeking to achieve?

- 1.7 Monmouthshire County Council (MCC) is in the process of preparing a Replacement Local Development Plan (RLDP) for the County (excluding the area within the Brecon Beacons National Park). The RLDP will cover the period 2018-2033 and will be the statutory land use plan to support delivery of

---

<sup>1</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report; and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

the Council's purpose of becoming a zero-carbon County, supporting well-being, health and dignity for everyone at every stage of life.

- 1.8 The RLDP will set out land use development proposals for the County and will identify where and how much new development will take place over the Replacement Plan period. It will also identify areas to be protected from development and provide policies against which future planning applications will be assessed. The RLDP builds upon the current adopted LDP which covers the period 2011-2021.

## Vision

- 1.9 The RLDP Vision outlines how the County is planned to develop, change, or be conserved up to 2033, and provides the framework for the Plan's strategy and policies. The Vision set out in the adopted LDP 2011-2021 has been reviewed and updated to take account of the issues, challenges and opportunities facing the County, key elements of the Gwent PSB Well-being Plan (August 2023) and MCC's Taking Monmouthshire Forward - Community and Corporate Plan 2022-2028 (April 2023).

**By 2033 Monmouthshire will be home to well-connected, exemplar affordable housing-led, net zero carbon places that provide employment and support demographically balanced sustainable and resilient communities for all, where:**

- **People are living in inclusive, equal, safe, cohesive, prosperous, and vibrant communities. Both urban and rural areas are well-connected with better access to local services and facilities, open space, and employment opportunities.**
- **Communities and businesses are part of an economically thriving, ambitious, and well-connected County.**
- **The best of the County's built heritage, countryside, biodiversity, landscape, and environmental assets have been protected and enhanced to retain its distinctive character.**
- **People enjoy healthier, more sustainable lifestyles with improved access to public transport and active travel opportunities and have a minimised impact on the global environment, supporting our ambitions for a zero-carbon County.**

## Objectives

- 1.10 To address the key issues/ challenges and deliver the vision, 17 objectives have been developed for the RLDP, which build upon the Adopted LDP objectives. The objectives are kept under review and updated as necessary as part of the continued development of the RLDP evidence base.
- 1.11 The objectives are set out in **Table 1.1** overleaf and have been grouped to align with the 7 wellbeing goals set out in the Wellbeing of Future Generation (Wales) Act 2015, and the RLDP issues, as well as the main policy themes identified in Planning Policy Wales (PPW12), the Gwent PSB Wellbeing Plan steps, and the Council's Community and Corporate Plan.

**Table 1.1: RLDP objectives and their contributions to wellbeing goals**

| RLDP Objective                                | Headline                       | RLDP Objective   | RLDP issues addressed <sup>2</sup> | Main PPW12 theme                   | Gwent PSB Well-being Plan Steps   | Community & Corporate Plan Objectives |
|---|--------------------------------|--|------------------------------------|------------------------------------|---|---------------------------------------|
| <b>A Prosperous Wales (Well-being Goal 1)</b> |                                |  |                                    |                                    |   |                                       |
| <b>Objective 1</b>                            | Economic Growth/<br>Employment | To support a thriving, well-connected, diverse economy, which provides a range of good quality employment opportunities to enable and encourage indigenous business growth and attract inward investment and competitive innovative businesses in appropriate growth sectors, including through the provision of start-ups and grow on spaces. | 1, 2, 3, 4, 5, 6, 7, 24            | Productive and enterprising places | Take action to reduce the cost-of-living crisis in the longer term.   | A Thriving and Ambitious Place.       |
| <b>Objective 2</b>                            | Town and Local centres         | To sustain and enhance the centres of Abergavenny, Caldicot, Chepstow, Magor, Monmouth, and Usk as vibrant and attractive centres serving the needs of their population and those of their surrounding hinterlands, and supporting adaptation to meet the needs of the evolving role of the high street.                                       | 8                                  | Active and social places           | Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles. Enable and support people, neighbourhoods, | A Thriving and Ambitious Place.       |

<sup>2</sup> See Appendix 1 of the Preferred Strategy for the full list of RLDP issues.

| RLDP Objective                               | Headline   | RLDP Objective   | RLDP issues addressed <sup>2</sup> | Main PPW12 theme               | Gwent PSB Well-being Plan Steps  | Community & Corporate Plan Objectives |
|--|--|--|------------------------------------|--------------------------------|--|---------------------------------------|
| <b>A Resilient Wales (Well-being Goal 2)</b> |  |  |                                    |                                |  |                                       |
| <b>Objective 3</b>                           | Green Infrastructure, Biodiversity and Landscape | To protect, enhance and manage the resilience of Monmouthshire’s natural environment, biodiversity and ecosystems and the connectivity between them, while at the same time maximising benefits for the economy, tourism, health, and well-being. This includes the Wye Valley National Landscape (AONB), the County’s other high quality and distinctive landscapes, protected sites, protected species and other biodiversity interests. | 11, 12, 35                         | Distinctive and natural places | Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. | A Green Place to Live.                |
| <b>Objective 4</b>                           | Flood risk                                       | To ensure that new development takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding or that may increase the risk of flooding elsewhere and the need  | 12, 13                             | Distinctive and natural places | Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore                          | A Green Place to Live.                |



| RLDP Objective     | Headline           | RLDP Objective  | RLDP issues addressed <sup>2</sup> | Main PPW12 theme                   | Gwent PSB Well-being Plan Steps  | Community & Corporate Plan Objectives |
|--------------------|--------------------|---|------------------------------------|------------------------------------|--|---------------------------------------|
|                    |                    | to design development, including the use of natural flood management measures to appropriately manage flood risk and surface water run-off.   |                                    |                                    | our natural environment.   |                                       |
| <b>Objective 5</b> | Minerals and Waste | To meet the County's regional and local obligations to manage and dispose of its waste and to safeguard and exploit its mineral resource in a sustainable fashion.  | 14, 15                             | Productive and enterprising places | Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. | A Green Place to Live.                |
| <b>Objective 6</b> | Land               | To promote the efficient use of land, including the need to: <ul style="list-style-type: none"> <li>• maximise opportunities for development on previously developed land, whilst recognising that brownfield opportunities are limited in Monmouthshire.</li> <li>• protect the best and most versatile (BMV) agricultural land whilst at the same time recognising that this will not always be possible given high proportion of BMV land in the County and the limited opportunities for brownfield development.</li> </ul> | 16, 17                             | Strategic and spatial choices      | Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. | A Green Place to Live.                |

| RLDP Objective                                | Headline              | RLDP Objective  | RLDP issues addressed <sup>2</sup> | Main PPW12 theme                   | Gwent PSB Well-being Plan Steps  | Community & Corporate Plan Objectives  |
|---|-----------------------|---|------------------------------------|------------------------------------|--|--|
|   |                       | <ul style="list-style-type: none"> <li>support the adaptation and re-use of existing sustainably located buildings.</li> </ul>  |                                    |                                    |  |  |
| <b>Objective 7</b>                            | Natural resources     | To ensure the efficient use of natural resources including providing increased opportunities for water efficiency, energy efficiency, renewable energy, recycling and waste reduction.  | 14, 15, 31, 37                     | Productive and enterprising places | Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. | A Green Place to Live.<br>A Safe Place to Live.  |
| <b>A Healthier Wales (Well-being Goal 3)</b>  |                       |   |                                    |                                    |  |  |
| <b>Objective 8</b>                            | Health and Well-being | To improve access for all to recreation, sport, leisure activities, open space, and the countryside and to enable healthier lifestyles. To support the Health Board to improve health infrastructure to meet community needs. | 18, 20, 21, 33, 35                 | Active and social places           | Take action to address inequities, particularly in relation to health, through the framework of the Marmot Principles.           | A Fair Place to Live.<br>A Safe Place to Live.<br>A Connected Place Where People Care. |
| <b>A More Equal Wales (Well-being Goal 4)</b> |                       |   |                                    |                                    |  |  |

| RLDP Objective   | Headline     | RLDP Objective   | RLDP issues addressed <sup>2</sup>                | Main PPW12 theme              | Gwent PSB Well-being Plan Steps   | Community & Corporate Plan Objectives   |
|--|--------------|--|---|-------------------------------|---|---|
| <b>Objective 9</b>   | Demography   | To increase opportunities for the younger population to both live and work within Monmouthshire, creating a more balanced demography and socially and economically sustainable communities.  | 2, 3, 4, 5, 24                                    | Active and social places      | Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. | A Fair Place to Live.<br>A Thriving and Ambitious Place.<br>A Safe Place to Live. |
| <b>A Wales of Cohesive Communities (Well-being Goal 5)</b> |              |  |   |                               |   |   |
| <b>Objective 10</b>  | Housing      | To provide urgently needed affordable housing within exemplar, mixed, sustainable, and well-connected places both for existing and future residents.   | 23, 25, 26, 27, 28                                | Active and social places      | Provide and enable the supply and good quality, affordable, appropriate homes.                            | A Fair Place to Live.<br>A Safe Place to Live.                                    |
| <b>Objective 11</b>  | Place-making | To create exemplar sustainable places through design, layout and mix of uses that enhance the character and identity of Monmouthshire's settlements and landscape; create attractive, safe, and accessible places to live, work and visit; and promote people's prosperity, health, happiness, and well-being. | 1, 11, 12, 18, 20, 27, 28, 29, 30, 31, 32, 34, 35 | Strategic and spatial choices | Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. | A Thriving and Ambitious Place.<br>A Safe Place to Live.                          |

| RLDP Objective      | Headline          | RLDP Objective   | RLDP issues addressed <sup>2</sup>                    | Main PPW12 theme                   | Gwent PSB Well-being Plan Steps   | Community & Corporate Plan Objectives  |
|---------------------|-------------------|--|---|------------------------------------|---|--|
| <b>Objective 12</b> | Communities       | To ensure Monmouthshire is a connected place where people feel part of a community, are valued, and have good access to education, employment, shops, housing, public transport, active travel, healthcare, community and cultural facilities.                             | 1, 5, 7, 8, 9, 18, 20, 25, 26, 27, 29, 30, 31, 33, 35 | Strategic and spatial choices      | Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. | A Fair Place to Live.<br>A Green Place.<br>A Thriving and Ambitious Place.<br>A Safe Place to Live.<br>A Connected Place Where People Care.<br>A Learning Place. |
| <b>Objective 13</b> | Rural Communities | To sustain existing rural communities as far as possible by providing affordable homes and development opportunities of an appropriate scale and location in rural areas in order to assist in building sustainable rural communities and strengthening the rural economy. | 6, 7, 20, 22, 26, 29, 30, 34                          | Productive and enterprising places | Provide and enable the supply of good quality, affordable, appropriate homes.                             | A Fair Place to Live.<br>A Safe Place to Live.   |
| <b>Objective 14</b> | Infrastructure    | To ensure that appropriate physical and digital infrastructure (including community and recreational facilities, education, sewerage, water, transport, health care and broadband etc.) is in  | 12, 19, 20, 31  | Productive and enterprising places | Enable and support people, neighbourhoods, and communities to be resilient,                               | A Green Place to Live.<br>A Thriving and Ambitious Place.  |

| RLDP Objective  | Headline                             | RLDP Objective  | RLDP issues addressed <sup>2</sup> | Main PPW12 theme               | Gwent PSB Well-being Plan Steps   | Community & Corporate Plan Objectives  |
|---|--------------------------------------|---|------------------------------------|--------------------------------|---|--|
|   |                                      | place or can be provided to accommodate new development.  |                                    |                                | connected, thriving and safe.   | A Connected Place Where People Care.<br>A Learning Place.                                |
| <b>Objective 15</b>   | Accessibility                        | To seek to reduce the need to travel by promoting a mix of land use allocations and improved internet connectivity, and where travel is required, to provide opportunities for active travel and integrated sustainable transport above use of the private car. | 10, 30, 36                         | Active and social places       | Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. | A Green Place to Live.<br>A Thriving and Ambitious Place.                                |
| <b>A Wales of Vibrant Culture &amp; Thriving Welsh Language (Well-being Goal 6)</b> |                                      |   |                                    |                                |   |  |
| <b>Objective 16</b>   | Culture, Heritage and Welsh Language | To protect and enhance the built environment, culture and heritage of Monmouthshire for the future while maximising benefits for the economy, tourism and social well-being, including supporting and safeguarding the Welsh Language.                          | 9, 32, 33, 34, 35                  | Distinctive and natural places | Enable and support people, neighbourhoods, and communities to be resilient, connected, thriving and safe. | A Fair Place.<br>A Thriving and Ambitious Place.<br>A Connected Place Where People Care. |

| RLDP Objective  | Headline                     | RLDP Objective  | RLDP issues addressed <sup>2</sup> | Main PPW12 theme               | Gwent PSB Well-being Plan Steps  | Community & Corporate Plan Objectives   |
|---|------------------------------|---|------------------------------------|--------------------------------|--|---|
| <b>A Globally Responsible Wales (Well-being Goal 7)</b> |                              |   |                                    |                                |  |   |
| <b>Objective 17</b>                                     | Climate and Nature Emergency | To strive to limit the increase in global temperatures to 1.5°C, supporting carbon reduction through a variety of adaptation measures including facilitating resilient ecosystems and nature recovery, the use of renewable energy, net zero homes, the design and location of new development, encouraging balanced job and population growth to reduce out-commuting, the provision of broadband connectivity to reduce the need to travel, the provision of ultra-low emission vehicle charging infrastructure to reduce emissions and improve air quality, and the provision of quality green infrastructure. | 10, 12, 36, 37, 38                 | Distinctive and natural places | Take action to reduce our carbon emissions, help Gwent adapt to climate change, and protect and restore our natural environment. | A Learning Place.<br><br>A Green Place to Live.<br>A Thriving and Ambitious Place.<br>A Safe Place to Live. |

## What is the scope of the ISA?

1.12 The scope of the ISA is essentially reflected in a list of sustainability objectives – grouped under ten ISA theme headings – established through scoping, considering context/ baseline review, identified key issues and responses from statutory consultees. Taken together, these ISA themes and objectives provide a methodological ‘framework’ for appraisal.

**Table 1.2: ISA Framework**

| ISA theme  | ISA objective  |
|--|--|
| <b>Economy and Employment</b>                            | Deliver sustainable economic growth by strengthening the local economy, promote tourism and enhance the vitality and viability of town centres.  |
|  | Increase the range and quality of employment opportunities within Monmouthshire to meet identified needs.  |
| <b>Population and Communities</b>                        | Provide a sufficient quantity of good quality housing in a range of types and tenures that allows people to meet their housing needs and supports economic growth and prosperity.  |
|  | Through place-making and sustainable design maintain and enhance the visual character and distinctiveness of the built environment to create great places to live. Support and promote the distinctive character of local communities.               |
| <b>Health and well-being</b>                             | To improve physical and mental health and wellbeing by encouraging healthier lifestyles, quality living environments and community safety.   |
| <b>Equalities, diversity, and social inclusion</b>       | To reduce poverty and inequality; tackle social exclusion and promote community cohesion.  |
| <b>Transport and Movement</b>                            | To improve access for all to jobs, services and facilities in a way that reduces reliance on car use through improving infrastructure and promoting active travel, whilst also ensuring access to high quality digital communications and utilities. |
| <b>Natural Resources (Air, Land, Minerals and Water)</b> | To reduce all forms of air pollution in the interests of improving local air quality.  |
|  | To use land efficiently by prioritising development on previously developed land, using existing land efficiently and protecting where possible higher grade agricultural land.  |
|  | To ensure that primary materials and minerals are managed in a sustainable way, including through the implementation of a circular economy by waste reduction, re-use, and recycling.  |

| ISA theme                            | ISA objective  |
|--------------------------------------|--|
|                                      | To maintain and improve the quality of ground, surface and coastal waters and the quantity of water available including potable water supplies, ground water and river levels.   |
| <b>Biodiversity and Geodiversity</b> | To conserve, protect and enhance biodiversity and geodiversity within and surrounding Monmouthshire.   |
| <b>Historic Environment</b>          | To conserve and enhance the significance of the County's historic environment, cultural assets (including the use of the Welsh language) and heritage assets and their settings. |
| <b>Landscape</b>                     | To protect and enhance the quality and character of the best of Monmouthshire's landscape, including its contribution to the setting and character of settlements.               |
| <b>Climate Change</b>                | To promote and encourage energy generation from renewable sources and energy efficiency.   |
| <b>Flood Risk</b>                    | Ensure that new development is designed and located to avoid the risk of flooding and ensure the risk of flooding is not increased elsewhere.                                    |



## **Part 1: What has plan-making/ ISA involved up to this point?**

## 2. Plan-making/ ISA up to this point

2.1 A review of the LDP has been underway since 2018, with a wide range of evidence produced to inform plan-making. **Table 2.1** below sets out the key RLDP and ISA documents published to date, along with dates for consultation. The RLDP documents and the evidence base (including the ISA Reports) can be viewed and downloaded on the Council's website.<sup>3</sup>

**Table 2.1: RLDP and ISA documents published to date**

| RLDP Documents and Consultation   | ISA Documents and Consultation   |
|---|--|
|   | ISA Scoping Report 2018 - Sent to statutory consultees for consultation from 26 <sup>th</sup> October to 30 <sup>th</sup> November 2018.   |
| Issues, Vision, and Objectives Paper (January 2019 as amended June 2021)  |  |
| Growth and Spatial Options Consultation Paper - Public consultation from July to August 2019  |  |
| Preferred Strategy<br>Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020))           | Initial ISA Report and NTS 2020<br>Public consultation from 09 March to 22 April 2020 (Consultation paused due to Covid-19. Consultation was ceased following advice from the Minister for Housing and Local Government (7th July 2020)) |
| RLDP Review of Issues, Vision, Objectives and Evidence Base in light of Covid-19 (September 2020)<br>This Review was agreed by Council on 22 October 2020 and submitted to the Welsh Government in accordance with Ministerial advice |  |
| Revisited RLDP Growth and Spatial Options Consultation Paper<br>Public consultation from January to February 2021   | ISA of Strategic Options Report 2021<br>Public consultation January to February 2021   |
| Sustainable and Resilient Communities Preferred Strategy<br>Public consultation from July to August 2021  | Initial ISA Report and NTS 2021<br>Public consultation from July to August 2021  |
| Preferred Strategy, December 2022<br>Public consultation from December 2022 to January 2023   | Initial ISA Report and NTS 2022<br>Public consultation from December 2022 to January 2023  |

<sup>3</sup> [Replacement Local Development Plan \(RLDP\) - 2018-2033 - Monmouthshire](#)

- 2.2 With a number of Initial ISA Reports published to date, this part of the NTS sets out the work that has been undertaken to develop and appraise reasonable alternatives, considering feedback from consultation at each stage and subsequent changes to the preferred strategy.
- 2.3 This includes how reasonable alternatives have been established considering the available evidence and feedback from consultation; a summary of the appraisal of reasonable alternatives; whilst **Chapter 3** explains the Council's reasons for selecting the preferred approach.

## Establishing the reasonable alternatives

### Level of growth

#### Level of growth options (2020)

- 2.4 In early development stages of the RLDP, Monmouthshire, Torfaen, and Blaenau Gwent County Councils jointly commissioned Edge Analytics to prepare a range of demographic, housing, and employment growth scenarios to inform the RLDP. A total of 20 different demographic-led, housing-led, and employment-led scenarios were generated for Monmouthshire. From these, eight growth options were selected for consultation, comprising of 2 low, 3 medium, and 3 high growth options, as set out in the Growth and Spatial Options Paper (June 2019), which was published for consultation from July to August 2019.
- 2.5 The Council took time to consider these options, consultation responses received, and informal feedback from Welsh Government officials; which indicated a lack of confidence in economic-led projections and a concern regarding ambitious LDPs. A decision was subsequently taken to commission Edge Analytics to model an additional demographic-led scenario. This scenario sought to address two of the key issues/ challenges facing the County in relation to retaining/ attracting younger adult population age groups and improving labour force retention.
- 2.6 The eight growth options identified in the June 2019 Consultation Paper together with the additional scenarios modelled by Edge Analytics (Growth Option 5A and Option 5A+) were assessed through the ISA in early 2020. For the purposes of the ISA process, the ten growth options were grouped together into three distinct options (Option 1 (Low Growth), Option 2 (Medium Growth), and Option 3 (High Growth)) to allow for a proportionate and meaningful appraisal to be carried out. An appraisal of the three grouped options were presented in the Initial ISA Report and consulted upon in March 2020.

#### Level of growth options (2021)

- 2.7 The Council revisited the Growth and Spatial Options stage of the RLDP process later in 2020 due to the publication of updated key evidence. Namely, in August 2020 the Welsh Government published corrected 2018-based population and household projections.
- 2.8 The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, form a fundamental part of the RLDP evidence base. These were considered together with other key evidence in relation to

issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area.

- 2.9 The 2020 publication of corrected Welsh Government 2018-based population and household projections comprised important new evidence that required consideration to ensure that the evidence base for the RLDP is robust and based on the most up to date information.
- 2.10 To take account of the latest evidence, an Updated Demographic Evidence Report (November 2021) was prepared by Edge Analytics, which set out a range of updated growth options for the RLDP.<sup>4</sup>
- 2.11 A total of fourteen different scenarios were generated for Monmouthshire, together with further sensitivity testing for all of the demographic and dwelling-led scenarios with regard to household formation and commuting ratios. From these fourteen different scenarios, six growth options were selected for further testing through the ISA. In addition to the initial modelling, all six selected options were the subject of additional testing to establish the impact on demography, dwellings, and household formation and employment of an affordable-housing policy-led strategy.
- 2.12 The six growth options identified in the Growth and Spatial Options Paper (December 2020) were assessed through the ISA in early 2021. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.<sup>5</sup>

### Level of growth options (2022)

- 2.13 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and required further consideration. In terms of the level of growth, Welsh Government (WG) raised significant concerns regarding the proposed level of growth and the Strategy's 'general conformity' with policies 1 and 33 of Future Wales: The National Plan 2040. This suggested that growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport, and the Valleys.
- 2.14 WG's consultation response took the unprecedented step of prescribing a maximum growth of 4,275 dwellings for Monmouthshire to 2033. This is considerably lower than the Preferred Strategy dwelling requirement that was consulted on (7,605 dwellings) and would result in barely any new housing allocations over RLDP period due to the existing housing landbank.
- 2.15 MCC considered that this approach would fail to deliver on key locally evidenced issues and objectives including affordable housing delivery, economic growth/prosperity and rebalancing the demography, to the detriment of the sustainability of the County's communities. MCC also felt it would fail to accord with policies 4, 5 and 7 of Future Wales: The National Plan 2040, which

---

<sup>4</sup> <https://www.monmouthshire.gov.uk/planning-policy/development-of-an-evidence-base/>

<sup>5</sup> AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan  
<https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf>

specifically support rural communities and seek to increase the delivery of affordable homes throughout Wales.

- 2.16 On 14th December 2021, a special meeting of the Council's Economy and Development Select Committee considered the implications of the WG Planning Division's response on Monmouthshire's communities and on addressing the locally evidence-based outcomes and objectives.
- 2.17 MCC considered that the WG letter poses a significant challenge for the Preferred Strategy. Namely, that an amended RLDP that follows the letter's requirements would not meet the tests of soundness at examination because it would not address the evidence-based issues or achieve the required outcomes. Conversely, proceeding as originally proposed would also be a high-risk strategy.
- 2.18 Consequently, MCC considered revised growth options which support lower dwelling requirements. These options were subject to appraisal in the Initial ISA Report 2022, alongside the growth strategy consulted on in 2021. These options are summarised below:
- **Option 1:** Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
  - **Option 2:** Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
  - **Option 3:** WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

### **Feedback from consultation and level of growth options in 2024**

- 2.19 In 2022, the Council's preferred approach was Option 2 as this would reduce the level of growth proposed compared to the 2021 Preferred Strategy which WG objected to, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing and retaining young people with access to new jobs.
- 2.20 At this stage (in 2024) no new evidence has emerged or is being considered that changes the alternatives developed in 2022 and these three options remain valid and up to date for the purposes of this ISA Report. The summary of the appraisal of these options is presented in Chapter 6.

## **Location of growth**

### **Location of growth options (2020)**

- 2.21 A total of eight Spatial Options were initially considered and included in the long list of spatial options (set out in Appendix 4 of the Growth and Spatial Options Consultation Paper, July 2019) but three were discounted prior to consultation as they were not considered to be genuinely realistic options. Accordingly, five spatial options were consulted on as part of the Growth and Spatial Options Consultation. Subsequent to this, as with the growth options, two additional spatial options were identified in light of consultation responses and emerging national policy at the time. Following on from this, a total of seven spatial options were considered through the ISA process in early 2020.

## Location of growth options (2021)

- 2.22 As highlighted above, the Council revisited the Growth and Spatial Options stage of the RLDP process in 2020 following the publication of the corrected Welsh Government 2018-based population and household projections (August 2020). The RLDP spatial options considered in 2020 were reassessed to identify suitable options for consideration as part of this process. Two of the options considered in the 2020 consultation included a new settlement. These options were subsequently discounted as the Welsh Government deemed them contrary to national policy set out in PPW (Edition 11), which states new settlements should only be proposed as part of a joint LDP, SDP or the NDF. An additional option, focusing growth in the north of the County, was subsequently included as a result of consultation responses on the 2020 Growth and Spatial Options.
- 2.23 A total of four broad Spatial Distribution Options were therefore taken forward as realistic options for ISA in 2021 which explored a continuation of the existing LDP strategy, proportionately distributed growth, growth focused on the M4 corridor, and growth focused in the north of the County. The assessment of these options was presented in the Initial ISA Report which accompanied the consultation on the 'Sustainable and Resilient Communities Preferred Strategy' in Summer 2021.<sup>6</sup>

## Location of growth options (2022)

- 2.24 Following consultation on the Preferred Strategy in 2021, a number of challenges arose which impacted on the progression of the RLDP and require further consideration. In terms of the spatial strategy, this specifically referred to the environmental impacts of phosphate in watercourses.
- 2.25 In light of new evidence, Natural Resources Wales (NRW) adopted tighter targets for the water quality of watercourses and conducted an assessment of the nine riverine Special Areas of Conservation (SAC) in Wales. This assessment established that phosphorus breaches are widespread within Welsh SAC rivers with over 60% of waterbodies failing against the new targets. Within Monmouthshire, NRW identified that within the River Usk, 88% of the river's water bodies failed to meet the required target and within the River Wye, 67% of the river's water bodies failed to meet the required target.
- 2.26 In response, NRW issued detailed planning guidance to ensure that the environmental capacity of the rivers does not deteriorate any further. Any proposed development within the affected catchment areas of the rivers Usk and Wye that might increase phosphate levels need to clearly evidence that the development can demonstrate phosphate neutrality or betterment in its design and/ or its contribution to the water body. This issue affects the upper (non-tidal) parts of the two rivers.
- 2.27 The phosphates water quality issue affecting the River Wye and River Usk had implications for the progression of the RLDP as the Preferred Strategy that was consulted on in 2021 directed future growth to a number of key sustainable settlements within these affected catchment areas. Further consideration was,

---

<sup>6</sup> AECOM (2021) ISA for the Monmouthshire Replacement Local Development Plan  
<https://www.monmouthshire.gov.uk/app/uploads/2021/07/Monmouthshire-Initial-ISA-Report-NTS-June-2021.pdf>

therefore, given as to how the RLDP can progress in light of this issue, carefully balancing the need for growth with the climate and nature emergency.

- 2.28 Following discussions with Dŵr Cymru/ Welsh Water (DCWW) and NRW, MCC realised that whilst a workable solution to this water quality issue is achievable for the Llanfoist Waste Water Treatment Works (WWTW) (River Usk catchment), there was no identified strategic solution for phosphate mitigation at the Monmouth WWTW (River Wye catchment) in 2022 that could be implemented during the Plan period.
- 2.29 Without an identified deliverable solution, it would not be possible to demonstrate at examination that sites in the Upper Wye Catchment are deliverable. This means that new site allocations for future growth could not be directed to settlements within the affected Wye catchment area, including the primary settlement of Monmouth, until a feasible solution is identified that can be implemented within a timescale that facilitates development within the Plan period. The restrictions on new housing and employment development in this area during the Plan period had obvious implications for the RLDP spatial strategy.
- 2.30 Consideration was therefore given to how to progress the RLDP having regard to the above challenges, whilst also ensuring that the RLDP delivers on the Council's objectives and core issues.
- 2.31 MCC subsequently developed a spatial option which did not direct growth to settlements within the affected Wye catchment area, including the primary settlement of Monmouth. This option, alongside the spatial strategy consulted on in 2021, were subject to appraisal in the Initial ISA Report 2022. The two options are summarised below:
- **Option 1:** Distribute growth proportionately across the County's most sustainable settlements.
  - **Option 2:** Focus growth in the County's most sustainable settlements of Abergavenny, Chepstow, and Caldicot, including Severnside, supported by lower growth in the most sustainable rural settlements (excluding those settlements in the Upper Wye catchment area).

## Strategic growth areas

### Strategic growth areas (2022)

- 2.32 In 2020, the Council identified potential strategic growth areas for each of the Primary Settlements and Severnside. To inform these possible strategic growth areas a preliminary high-level assessment of sites submitted during the Initial Call for Candidate Sites was undertaken by the Council to identify those sites which could contribute to delivering the level of growth (housing and jobs) required to deliver the Preferred Strategy. Only strategic sites and sustainable urban extensions of around 8ha in size and above were considered.
- 2.33 The identified strategic growth areas were considered by the Council to have the potential to underpin the Spatial Strategy, by accommodating growth and focusing development within those settlements and areas which are identified as the most sustainable locations.

2.34 The potential strategic growth options were assessed through the Initial ISA Report 2021 and reproduced in the Initial ISA Report 2022. The strategic growth options were located in Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside.

## Feedback from consultation and location of growth options in 2024

2.35 Since 2022, DCWW have identified strategic improvements at the Monmouth Wastewater Treatment Works that can be implemented by 31st March 2025 which has provided WG with sufficient certainty to allow for new growth allocations in the Upper Wye Catchment, including at Monmouth. On this basis, there is no need to continue to assess or develop options that avoid growth in settlements in the Upper Wye Catchment area. The four options developed for ISA in 2021 are therefore considered to be representative of the choices available to the Council at this stage, supported by an assessment of the strategic growth locations which remain the same as reported on in 2021 and 2022.

## Summary of options (2024)

2.36 In summary, the discussion in this chapter has identified no new options for assessment at this stage, and previously assessed options are reproduced as the representative choices for the Council in terms of their preferred approach and reasonable alternatives. The choices that are taken forward for assessment in Chapter 6 are:

### Level of growth

- **Option 1:** Existing Preferred Strategy growth level of 7,605 new dwellings over the entire plan period alongside the creation of 7,215 new jobs.
- **Option 2:** Demographic led strategy growth level of 5,400 new dwellings over the entire plan period alongside the creation of 6,240 new jobs.
- **Option 3:** WG prescribed growth level of 4,280 new dwellings over the entire plan period alongside the creation of 4,290 new jobs.

### Location of growth

- **Option 1:** Continuation of the existing LDP Strategy – distributing growth around the County with a particular focus on Main Towns, with some development in Severnside and some development in the most sustainable rural areas.
- **Option 2:** Proportionately distributed growth – growth would be distributed across the County’s most sustainable settlements with the level of growth proportionate to that settlement’s size and existing amenities, as well as the identified affordable housing need and capacity for growth.
- **Option 3:** Growth focused on the M4 corridor – focusing growth in the south of the County in the Severnside area close to the M4/ M48, to capitalise on its strategic links to the Cardiff Capital Region and South West England.
- **Option 4:** Growth focused in the north of the County – focusing growth in most sustainable settlements in the north of the County to capitalise on its strategic links to the Heads of the Valleys and wider Cardiff Capital Region via the A465, and towards Herefordshire via the A449 and A40.



## Strategic growth locations

- **Abergavenny and Llanfoist:**
  - **Option A:** Land north of Abergavenny.
  - **Option B:** Land to the east of the A465; and
  - **Option C:** Land between the B4246 and Heads of the Valleys Road.
- **Chepstow:**
  - **Option D:** Land north of the Bayfield Estate.
  - **Option E:** Land between the Bayfield Estate and A48; and
  - **Option F:** Land between the A48 and M48.
- **Monmouth:**
  - **Option G:** Land west of Monmouth.
  - **Option H:** Land in central Monmouth; and
  - **Option I:** Land north-east of Monmouth.
- **Severnside:**
  - **Option J:** Land north-east of Caldicot.
  - **Option K:** Land north-west of Caldicot.
  - **Option L:** Land west of Caldicot/ east of Rogiet; and
  - **Option M:** Land east of Caerwent.

## Appraising the reasonable alternatives

2.37 The strategic options identified above were subject to a comparative appraisal under each ISA theme and the detailed findings are presented below.

2.38 For each of the strategic options, the assessment has examined likely significant effects on the baseline, drawing on the sustainability objectives and themes identified through scoping (see **Table 2.1**) as a methodological framework. Based on the evidence available a judgement is made if there is likely to be a significant effect. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. The number indicates the rank and does not have any bearing on likely significant effects. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. For example, if an option is ranked as 1 then it is judged to perform better against that ISA theme compared to an option that is ranked 2 or 3 or so on.

## Level of growth

2.39 The three growth level options were subject to a comparative appraisal under each ISA theme and the summary findings are presented overleaf.

**Table 2.2: Summary findings for level of growth options**

| <b>ISA theme</b>  | <b>Rank/ significant effects</b> | <b>Option 1</b>       | <b>Option 2</b>       | <b>Option 3</b>  |
|---|----------------------------------|-----------------------|-----------------------|------------------|
| <b>Economy and employment</b>                             | <b>Rank</b>                      | <b>1</b>              | <b>2</b>              | <b>3</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - positive</b> | <b>Yes - positive</b> | <b>No</b>        |
| <b>Population and communities</b>                         | <b>Rank</b>                      | <b>1</b>              | <b>2</b>              | <b>3</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - positive</b> | <b>Yes - positive</b> | <b>No</b>        |
| <b>Health and wellbeing</b>                               | <b>Rank</b>                      | <b>1</b>              | <b>2</b>              | <b>3</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - positive</b> | <b>Yes - positive</b> | <b>No</b>        |
| <b>Equalities, diversity, and social inclusion</b>        | <b>Rank</b>                      | <b>1</b>              | <b>2</b>              | <b>3</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - positive</b> | <b>Yes - positive</b> | <b>No</b>        |
| <b>Transport and movement</b>                             | <b>Rank</b>                      | <b>1</b>              | <b>2</b>              | <b>3</b>         |
|   | <b>Significant effect?</b>       | <b>No</b>             | <b>No</b>             | <b>No</b>        |
| <b>Natural resources (air, land, minerals, and water)</b> | <b>Rank</b>                      | <b>3</b>              | <b>2</b>              | <b>1</b>         |
|   | <b>Significant effect?</b>       | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Uncertain</b> |
| <b>Biodiversity and geodiversity</b>                      | <b>Rank</b>                      | <b>3</b>              | <b>2</b>              | <b>1</b>         |
|   | <b>Significant effect?</b>       | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Uncertain</b> |
| <b>Historic environment</b>                               | <b>Rank</b>                      | <b>3</b>              | <b>2</b>              | <b>1</b>         |
|   | <b>Significant effect?</b>       | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Uncertain</b> |

| <b>ISA theme</b>                             | <b>Rank/ significant effects</b> | <b>Option 1</b>  | <b>Option 2</b>  | <b>Option 3</b>  |
|--|----------------------------------|------------------|------------------|------------------|
| <b>Landscape</b>                             | <b>Rank</b>                      | <b>3</b>         | <b>2</b>         | <b>1</b>         |
|  | <b>Significant effect?</b>       | <b>Uncertain</b> | <b>Uncertain</b> | <b>Uncertain</b> |
| <b>Climate change (including flood risk)</b> | <b>Rank</b>                      | <b>1</b>         | <b>2</b>         | <b>3</b>         |
|  | <b>Significant effect?</b>       | <b>No</b>        | <b>No</b>        | <b>No</b>        |

- 2.40 For ISA themes relating to natural resources, biodiversity, the landscape, and historic environment; the nature and significance of effects will be dependent on where growth is located and how development is designed/ implemented. As the level of growth increases so does the likelihood that impacts will occur, and negative effects will arise. Residual effects in this respect are uncertain and will be better informed by consideration of the location of growth, the sensitivity of receptors in these areas, and the potential mitigation measures available. The lowest growth option (Option 3) is ultimately ranked most favourably in respect of the potential environmental impacts, though it is also recognised that higher levels of development proposed through Option 1, followed by Option 2, have further potential to deliver environmental enhancements/ improvements that could lead to positive effects.
- 2.41 At this stage there is no evidence to conclude that the higher levels of growth would result in a significant negative effect on biodiversity/ geodiversity, the landscape and historic environment (in the absence of known development locations). However, given the limited brownfield resource in the County, development is likely to be primarily delivered through settlement expansion on greenfield land, with residual negative effects likely. The significance of the effects is likely to increase as the level of growth increases. There is uncertainty in terms of impact on important mineral resources and agricultural land until the location of growth is more defined.
- 2.42 Similarly, for the transport ISA theme, Options 1 and 2 proposing a higher level of growth are more likely to result in impacts on the local road network through increased traffic and congestion; however, no evidence suggests impacts are likely to be of significance. Recent increases in homeworking because of the pandemic is considered likely to prevail as a longer-term trend which will continue to support reduced congestion. Further, higher growth presents an increased potential to deliver accessibility and infrastructure improvements and result in more self-contained communities. This could lead to reduced levels of out commuting and modal shift, the importance of which have all been highlighted during the pandemic. As a result, higher growth Option 1, followed by Option 2, are ranked more favourably than Option 3 overall.
- 2.43 Option 3 is noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. However, there is a level of uncertainty, with effects unlikely to be significant in most cases. Particular concern relates predominantly to limited growth restricting opportunities to address a likely resultant demographic imbalance, which in turn would not support sustainable economic growth. Under this option, limited opportunities for the younger population to live and work in the County would negatively impact communities, exacerbating inequality and rural isolation. This is particularly relevant to certain groups with protected characteristics, such as the young, elderly, and disabled, who tend to be disproportionately affected by accessibility issues and the negative effects of transport infrastructure. Further, under Option 3 there would be a limited opportunity to secure additional market or affordable housing, limiting the range and choice of homes (housing mix) which could drive up house prices and exacerbate affordability issues.
- 2.44 High growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/ wellbeing and equalities as the additional growth provides an opportunity to

deliver a greater range of new housing, employment opportunities and community infrastructure to meet the needs of the County. Option 2 performs slightly less positively than Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this Option, providing a more balanced demographic and more sustainable communities than predicted under Option 3.

## **Spatial strategy**

2.45 The four spatial strategy options were subject to a comparative appraisal under each ISA theme. The summary findings are presented overleaf.

**Table 2.3: Summary findings for location of growth options**

| <b>ISA theme</b>  | <b>Rank/ significant effects</b> | <b>Option 1</b>       | <b>Option 2</b>       | <b>Option 3</b>  | <b>Option 4</b>  |
|---|----------------------------------|-----------------------|-----------------------|------------------|------------------|
| <b>Economy and employment</b>                             | <b>Rank</b>                      | <b>1</b>              | <b>1</b>              | <b>2</b>         | <b>2</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - Positive</b> | <b>Yes - Positive</b> | <b>Uncertain</b> | <b>Uncertain</b> |
| <b>Population and communities</b>                         | <b>Rank</b>                      | <b>1</b>              | <b>1</b>              | <b>2</b>         | <b>2</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - Positive</b> | <b>Yes - Positive</b> | <b>Uncertain</b> | <b>Uncertain</b> |
| <b>Health and wellbeing</b>                               | <b>Rank</b>                      | <b>1</b>              | <b>1</b>              | <b>3</b>         | <b>2</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - Positive</b> | <b>Yes - Positive</b> | <b>Uncertain</b> | <b>Uncertain</b> |
| <b>Equalities, diversity, and social inclusion</b>        | <b>Rank</b>                      | <b>1</b>              | <b>1</b>              | <b>2</b>         | <b>2</b>         |
|   | <b>Significant effect?</b>       | <b>Yes - Positive</b> | <b>Yes - Positive</b> | <b>Uncertain</b> | <b>Uncertain</b> |
| <b>Transport and movement</b>                             | <b>Rank</b>                      | <b>1</b>              | <b>1</b>              | <b>2</b>         | <b>3</b>         |
|   | <b>Significant effect?</b>       | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Uncertain</b> | <b>Uncertain</b> |
| <b>Natural resources (air, land, minerals, and water)</b> | <b>Rank</b>                      | <b>1</b>              | <b>1</b>              | <b>3</b>         | <b>2</b>         |

| ISA theme                             | Rank/ significant effects | Option 1       | Option 2       | Option 3       | Option 4       |
|---------------------------------------|---------------------------|----------------|----------------|----------------|----------------|
|                                       | Significant effect?       | Yes - Negative | Yes - Negative | Yes - Negative | Yes - Negative |
| Biodiversity and geodiversity         | Rank                      | 3              | 3              | 1              | 2              |
|                                       | Significant effect?       | Yes – Negative | Yes - Negative | Uncertain      | Yes - Negative |
| Historic environment                  | Rank                      | =              | =              | =              | =              |
|                                       | Significant effect?       | Uncertain      | Uncertain      | Uncertain      | Uncertain      |
| Landscape                             | Rank                      | 2              | 2              | 1              | 2              |
|                                       | Significant effect?       | Uncertain      | Uncertain      | Uncertain      | Uncertain      |
| Climate change (including flood risk) | Rank                      | 2              | 2              | 1              | 2              |
|                                       | Significant effect?       | Uncertain      | Uncertain      | Uncertain      | Uncertain      |

- 2.46 The appraisal found that there is little to differentiate between the options at this stage regarding the historic environment ISA theme. This is given that all options have the potential to result in negative effects by directing development to areas that are sensitive in terms of heritage constraints, albeit in different areas of the County. However, it is recognised that mitigation could be provided, and that development also has the potential to deliver positive effects environmental improvement/ enhancement measures secured at the project scale. The nature and significance of effects will be dependent on the precise scale and location of development.
- 2.47 Similar conclusions can also be drawn in relation to biodiversity given the presence of international, national, and local designations throughout the County, though options can be differentiated between in relation to nutrient neutrality implications on the River Wye and River Usk SACs. Whilst solutions are available the options are ranked according to the mitigation requirements. Options 1 and 2, which direct growth to these Primary Settlements (followed by Option 4), therefore are worst performing overall.
- 2.48 In terms of the landscape and climate change themes, Option 3 directs development to areas of lower flood risk and that are less sensitive in landscape terms and is therefore considered to perform better compared to the other options. All other options focus development in areas that are of high flood risk (though it is anticipated that high flood risk areas would be avoided in line with national policy and sequential testing) and near landscape designations with a higher likelihood of negative effect arising. Given that the precise location of growth is not known, and further evidence base work is being carried out around landscape sensitivity, all of the options are found to have uncertain effects in relation to the landscape and climate change themes.
- 2.49 In terms of natural resources, it is difficult to identify any significant differences between the options in relation to water resources and quality. Options 1, 2 and 4, are best performing in terms of utilising brownfield land and protecting Best and Most Versatile (BMV) agricultural land and ensuring that air quality is not reduced throughout the County. However, it is recognised that there are limited opportunities for the regeneration of brownfield land so ultimately most growth will be on greenfield and potentially agricultural land. Option 3 performs less well given it may also lead to the loss of significant greenfield/ BMV land and has the potential to adversely impact upon the Limestone Mineral Safeguarding Area present to the south of the County. All the Options have the potential for a significant negative effect against the natural resources theme through the potential loss of BMV agricultural land, although it is acknowledged that there is an element of uncertainty at this stage until the precise location of development is known.
- 2.50 Options 1 and 2 perform more positively and are found to have the potential for significant long term positive effects against ISA themes relating to population/ communities, health/ wellbeing, economy/ employment, and equalities compared to the other options. They focus growth at the most sustainable Settlements where there is greater need and better access to public transport, existing employment, and facilities/ services. The importance of high levels of local accessibility to open space, services and facilities have been highlighted through the current pandemic. It should be noted that there are some small differences between Options 1 and 2 in terms of how growth is distributed during the Plan period, but these differences are not significant enough to



warrant one option being ranked higher or lower than the other against the ISA themes referred to earlier in this paragraph.

- 2.51 Option 3 capitalises upon opportunities associated with the Cardiff Capital Region City Deal, the South East Wales Metro, and the continuing economic growth of the Bristol/ South West region. Whereas Option 4 focuses growth to the most sustainable Settlements to the North of the County capitalising upon opportunities associated with the Cardiff Capital Region City Deal, the A465, and towards Herefordshire via the A449 and A40 along with rail links to Newport, Cardiff and the North via the Welsh Marches line. However, limited growth to the rest of the County under Option 3 and Option 4 would restrict economic growth in the wider County, and would not assist in sustaining Monmouthshire's existing communities, exacerbating existing demographic issues and levels of out-commuting.
- 2.52 Consideration is also given throughout the appraisal to Future Wales National Plan 2040 (National Development Framework (NDF) 2021) which indicates a desire to designate a Green Belt "around Newport and eastern parts of the region". This is anticipated to include a large part of South Monmouthshire which, although it does not include any of Monmouthshire's main towns, if implemented would significantly constrain future growth in this part of the County. Option 4 would accord with the direction of the Future Wales document, and therefore performs positively in terms of facilitating growth consistent with emerging National policy. PPW notes that longer term needs should be considered when considering the boundaries of a Green Belt. Conversely Option 3 would direct growth to the south where the Green Belt is proposed through the Future Wales document. As all other options seek to disperse growth throughout the County, and a defined location has not yet been established for the Green Belt, it is difficult to make any definitive conclusions on the nature and significance of effects at this stage.

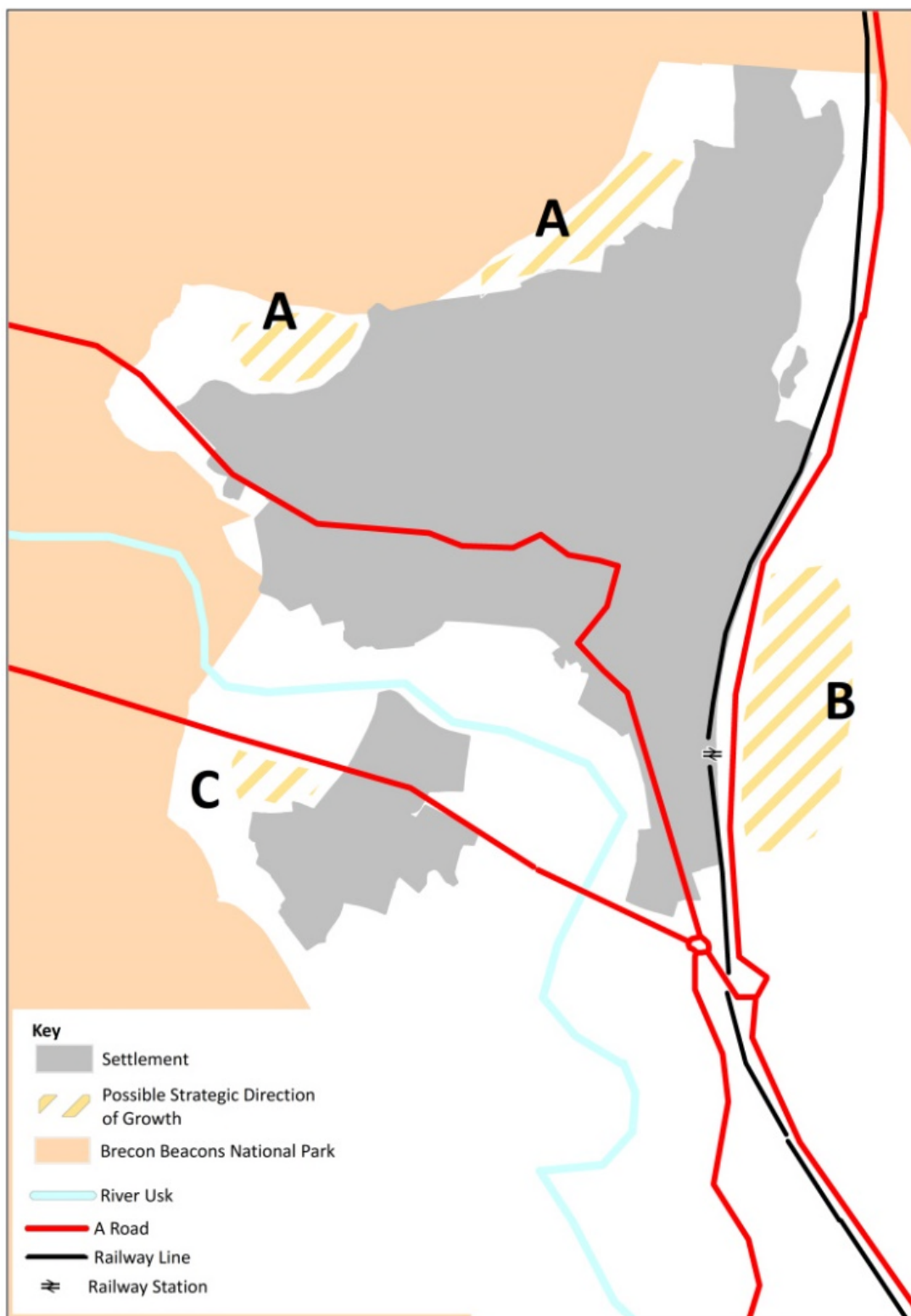
## Strategic growth areas

- 2.53 Strategic growth options have been identified across the four settlement areas of Abergavenny and Llanfoist, Chepstow, Monmouth, and Severnside. A summary of the assessment of these options is provided below.

### Abergavenny and Llanfoist

- **Option A:** Land north of Abergavenny.
- **Option B:** Land to the east of the A465; and
- **Option C:** Land between the B4246 and Heads of the Valleys Road.

**Figure 2.1: Strategic growth options in Abergavenny and Llanfoist**



**Table 2.4: Summary findings for Abergavenny and Llanfoist strategic growth options**

| ISA theme                                   | Rank/<br>Significant<br>effects | Option A       | Option B       | Option C       |
|---|---------------------------------|----------------|----------------|----------------|
| Economy and employment                      | Rank                            | 1              | 2              | 3              |
|   | Significant effect?             | No             | No             | No             |
| Population and communities                  | Rank                            | 1              | 2              | 3              |
|   | Significant effect?             | Yes - Positive | Yes - Positive | Yes - Positive |
| Health and wellbeing                        | Rank                            | 1              | 2              | 2              |
|   | Significant effect?             | No             | No             | No             |
| Equalities, diversity, and social inclusion | Rank                            | 2              | 3              | 1              |
|   | Significant effect?             | No             | No             | No             |
| Transport and movement                      | Rank                            | =              | =              | =              |
|   | Significant effect?             | No             | No             | No             |
| Natural resources                           | Rank                            | 1              | 2              | 3              |
|   | Significant effect?             | Yes - Negative | Yes - Negative | Yes - Negative |
| Biodiversity and geodiversity               | Rank                            | 1              | 1              | 2              |
|   | Significant effect?             | Yes - Negative | Yes - Negative | Yes - Negative |
| Historic environment                        | Rank                            | 2              | 1              | 3              |
|   | Significant effect?             | Uncertain      | Uncertain      | Uncertain      |
| Landscape                                   | Rank                            | 3              | 1              | 2              |
|   | Significant effect?             | Yes - Negative | Yes - Negative | Uncertain      |

| ISA theme                                   | Rank/<br>Significant<br>effects | Option A  | Option B  | Option C  |
|---|---------------------------------|-----------|-----------|-----------|
| Climate change<br>(including flood<br>risk) | Rank                            | 2         | 1         | 3         |
|   | Significant<br>effect?          | Uncertain | Uncertain | Uncertain |

- 2.54 No significant differences have been identified between Options for the Transport and Movement ISA theme.
- 2.55 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Abergavenny town centre, its services and facilities, and sustainable travel. Option A performs most positively of the Options for the majority of ISA Themes discussed above given this Option is most well located in this respect; with Options B and C dissected from the town centre by the A465. However, Option C performs most positively against the Equalities, diversity, and social inclusion ISA theme as this Option best supports deprived communities to the west of the town.
- 2.56 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option A is best performing against this ISA theme as it has the greatest access to the town centre.
- 2.57 In terms of the Biodiversity ISA theme, Options are constrained in terms of internationally/ nationally/ designated assets/sites, with the potential for significant long term negative effects. Whilst solutions are now available, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, Option C is the worst performing theme as it is within 200m of the River Usk SAC/ SSSI, however given the additional impact pathways identified through the HRA for the SAC (recreation and water quantity, level, and flow), it is considered that Options A and B also have the potential to impact upon this European designated site.
- 2.58 Options are also constrained in terms of internationally/ nationally/ designated assets/sites under the Landscape and Historic Environment ISA themes. As with biodiversity, Option C is worst performing against the Historic Environment ISA theme given its proximity to the Blaenavon Industrial WHS and potential to affect internationally and nationally designated heritage landscapes. Option A also has the potential to lead to negative effects in this respect. In terms of Landscape, Option A is worst performing due to the potential impact on the Brecon Beacons National Park, its open character and hillside setting. Option A is also worst performing given its 'high/medium' sensitivity to residential development, as set out in the Monmouthshire Landscape Sensitivity Update

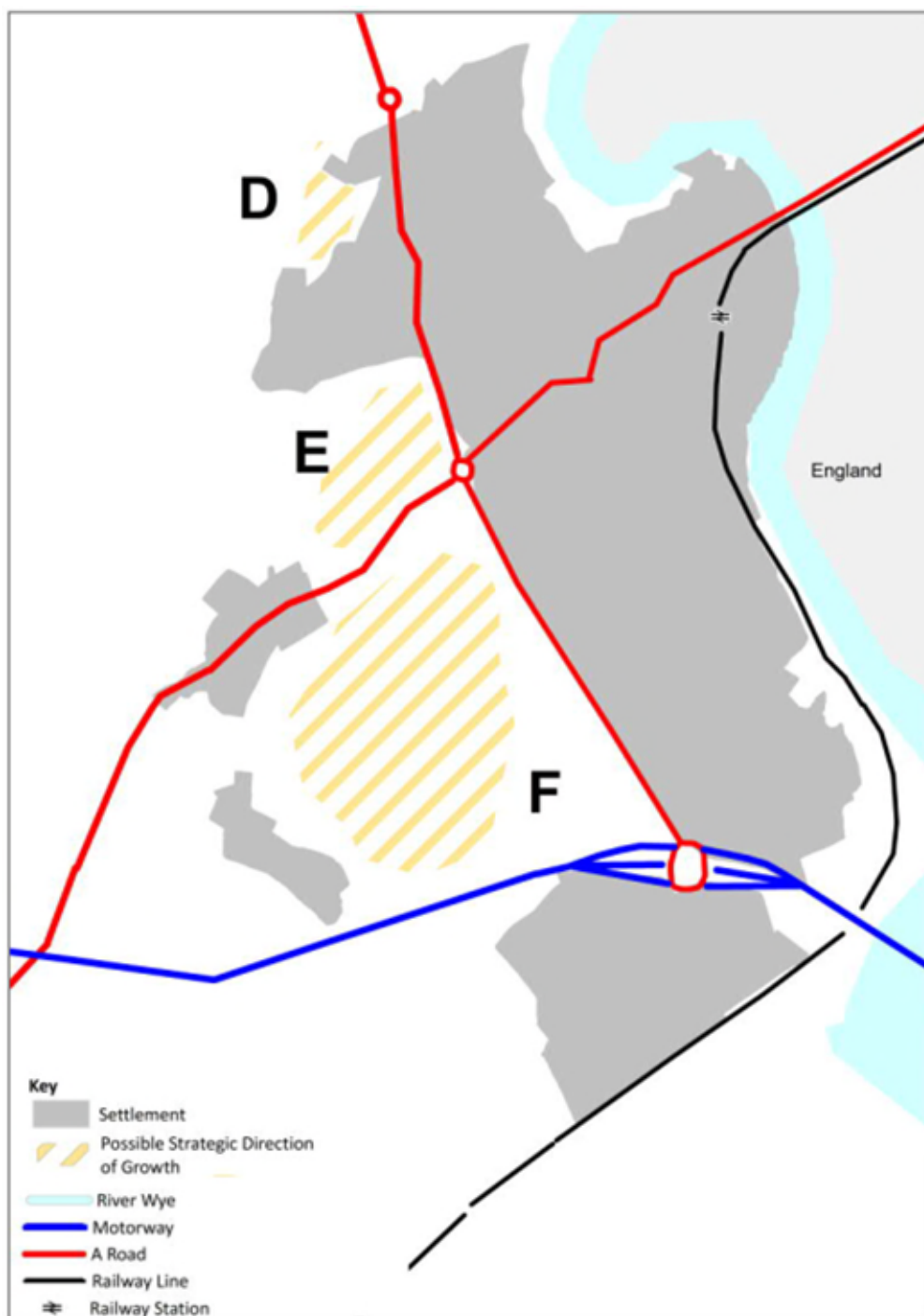
Study (2020). Option B is also identified as having 'high/medium' sensitivity to residential development.

- 2.59 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the issue of nutrient neutrality in the River Usk SAC, all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.
- 2.60 Option C is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option C is located within areas at higher risk of flooding, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

### **Chepstow**

- **Option D:** Land north of the Bayfield Estate.
- **Option E:** Land between the Bayfield Estate and A48; and
- **Option F:** Land between the A48 and M48.

**Figure 2.2: Strategic growth options in Chepstow**



**Table 2.5: Summary findings for Chepstow strategic growth options**

| ISA theme                 | Rank/<br>Significant<br>effects | Option D | Option E | Option F |
|---------------------------|---------------------------------|----------|----------|----------|
| Economy and<br>employment | Rank                            | 3        | 2        | 1        |
|                           | Significant<br>effect?          | No       | No       | No       |

| ISA theme                                   | Rank/<br>Significant<br>effects | Option D              | Option E              | Option F              |
|---|---------------------------------|-----------------------|-----------------------|-----------------------|
| Population and communities                  | Rank                            | =                     | =                     | =                     |
|   | Significant effect?             | <b>Yes - Positive</b> | <b>Yes - Positive</b> | <b>Yes - Positive</b> |
| Health and wellbeing                        | Rank                            | =                     | =                     | =                     |
|   | Significant effect?             | <b>No</b>             | <b>No</b>             | <b>No</b>             |
| Equalities, diversity, and social inclusion | Rank                            | <b>2</b>              | <b>1</b>              | <b>3</b>              |
|   | Significant effect?             | <b>No</b>             | <b>No</b>             | <b>No</b>             |
| Transport and movement                      | Rank                            | =                     | =                     | =                     |
|   | Significant effect?             | <b>No</b>             | <b>No</b>             | <b>No</b>             |
| Natural resources                           | Rank                            | =                     | =                     | =                     |
|   | Significant effect?             | <b>Yes - Negative</b> | <b>Yes - Negative</b> | <b>Yes - Negative</b> |
| Biodiversity and geodiversity               | Rank                            | <b>1</b>              | <b>2</b>              | <b>3</b>              |
|   | Significant effect?             | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Uncertain</b>      |
| Historic environment                        | Rank                            | <b>1</b>              | <b>1</b>              | <b>2</b>              |
|   | Significant effect?             | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Yes - Negative</b> |
| Landscape                                   | Rank                            | <b>2</b>              | <b>1</b>              | <b>3</b>              |
|   | Significant effect?             | <b>Uncertain</b>      | <b>Yes - Negative</b> | <b>Yes - Negative</b> |
| Climate change (including flood risk)       | Rank                            | =                     | =                     | =                     |
|   | Significant effect?             | <b>Uncertain</b>      | <b>Uncertain</b>      | <b>Uncertain</b>      |

2.61 No significant differences have been identified between Options for the Population and Communities, Transport and Movement, Health and Wellbeing, Natural Resources, and Climate Change ISA themes.

- 2.62 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion and Transport and Movement ISA theme. In terms of Economy and Employment, Option F performs most positively given it is well connected with the M4 corridor, the Severn Bridge, and employment opportunities to the south of the town. In terms of Equalities, Diversity and Social Inclusion, Option E is best performing as it provides improved access for vulnerable groups to the town centre; supporting improved levels of deprivation.
- 2.63 All Options perform negatively against the Natural Resources ISA theme given all Options would result in increased vehicular use within Chepstow AQMA, and the permeant loss of BMV agricultural land /greenfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land.
- 2.64 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. In terms of biodiversity, given the impact pathways identified through the HRA (2019), all Options perform equally in terms of impact on the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve and the River Wye SAC/ SSSI. Option F is the worst performing against the Biodiversity ISA theme as there are areas of Ancient Woodland (and other habitats and associated species) present within the Option, impacts upon which have the potential for long term negative effects.
- 2.65 Option F is the most sensitive in terms of the historic environment as the growth area falls within a conservation area and contains 16 listed buildings. It is not possible to identify any significant differences between Options D and E at this stage in terms of the Historic Environment ISA theme; however, they are considered to be less likely to result in residual significant effects compared to Option F.
- 2.66 All of the options have the potential for a significant negative effect on the Landscape ISA them. Assuming that the same scale/ type of development would be delivered within the strategic growth areas, the differences identified between them at this stage mainly reflect the Landscape Sensitivity Update Study (2020) and findings. Option F is worst performing, given its 'high' sensitivity to residential development; followed by Option D given it is identified as having medium landscape sensitivity and located adjacent to the AONB.
- 2.67 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

## Monmouth

- **Option G:** Land west of Monmouth.
- **Option H:** Land in central Monmouth; and
- **Option I:** Land north-east of Monmouth.



**Figure 2.3: Strategic growth options in Monmouth**



**Table 2.6: Summary findings for Monmouth strategic growth options**

| ISA theme                                   | Rank/<br>Significant effects | Option G       | Option H       | Option I       |
|---|------------------------------|----------------|----------------|----------------|
| Economy and employment                      | Rank                         | 2              | 1              | 3              |
|   | Significant effect?          | No             | No             | No             |
| Population and communities                  | Rank                         | 2              | 1              | 1              |
|   | Significant effect?          | Yes - Positive | Yes - Positive | Yes - Positive |
| Health and wellbeing                        | Rank                         | 1              | 1              | 1              |
|   | Significant effect?          | No             | No             | No             |
| Equalities, diversity, and social inclusion | Rank                         | =              | =              | =              |
|   | Significant effect?          | No             | No             | No             |

| ISA theme                             | Rank/<br>Significant<br>effects | Option G       | Option H       | Option I       |
|---------------------------------------|---------------------------------|----------------|----------------|----------------|
| Transport and movement                | Rank                            | =              | =              | =              |
|                                       | Significant effect?             | No             | No             | No             |
| Natural resources                     | Rank                            | 1              | 2              | 3              |
|                                       | Significant effect?             | Yes - Negative | Yes - Negative | Yes - Negative |
| Biodiversity and geodiversity         | Rank                            | 1              | 1              | 2              |
|                                       | Significant effect?             | Yes - Negative | Yes - Negative | Yes - Negative |
| Historic environment                  | Rank                            | 1              | 2              | 3              |
|                                       | Significant effect?             | Uncertain      | Uncertain      | Uncertain      |
| Landscape                             | Rank                            | 1              | 2              | 2              |
|                                       | Significant effect?             | Uncertain      | Yes - Negative | Yes - Negative |
| Climate change (including flood risk) | Rank                            | =              | =              | =              |
|                                       | Significant effect?             | Uncertain      | Uncertain      | Uncertain      |

- 2.68 No significant differences have been identified between Options for the Equalities, Diversity and Social Inclusion, Transport and Movement, and Climate Change ISA themes.
- 2.69 All Options perform positively against the Economy and Employment ISA theme, Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options are connected with reasonable distance to Monmouth town centre, its services and facilities, and sustainable travel. Option H performs most positively of the Options for Economy and Employment, Population and Communities, and Health and Wellbeing ISA Themes given this Option is most well located in this respect. Option G also performs well due to its location adjacent to the Wonastow Estate employment site.
- 2.70 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option G is best performing in this respect as it is the least constrained Option

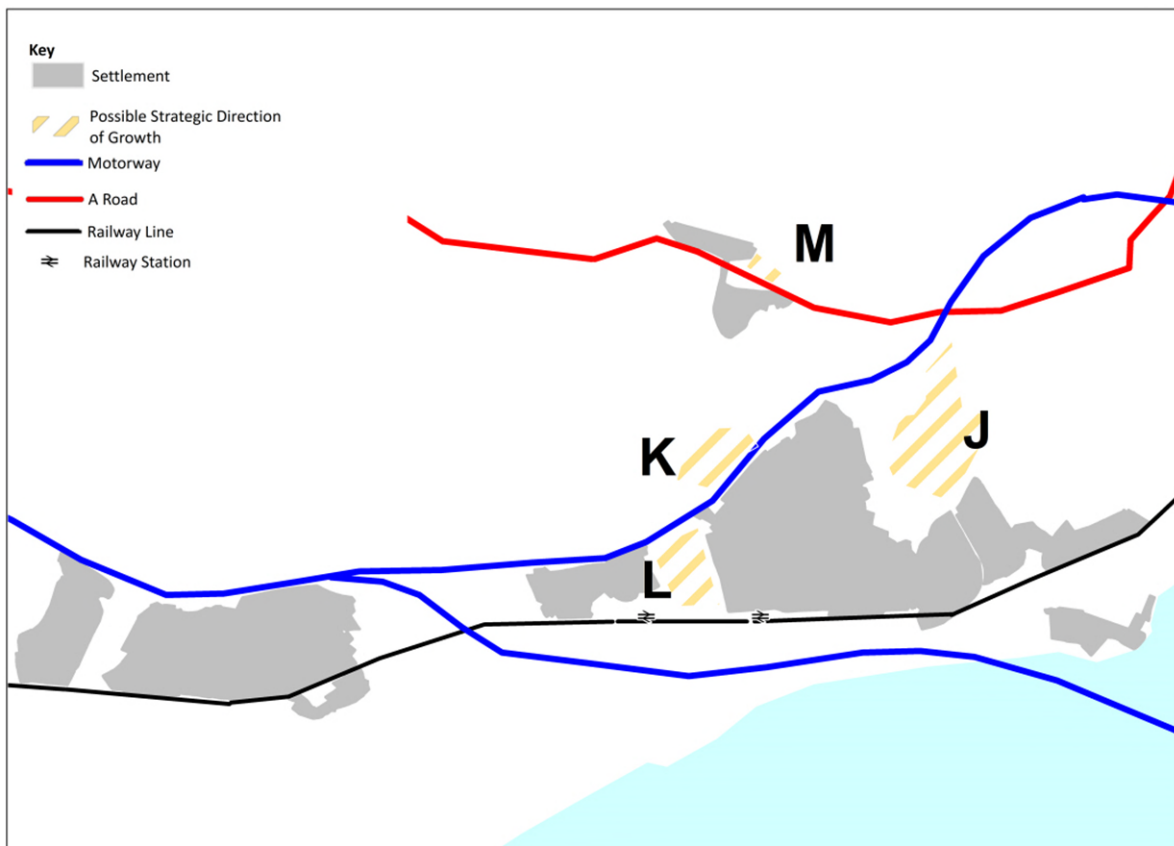
in terms of BMV agricultural land coverage. Option I is worst performing given it would result in the loss of higher quality agricultural land in comparison with Option H.

- 2.71 In terms of the Biodiversity ISA themes; all Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Whilst solutions are now available to address nutrient neutrality issues, the mitigation requirements need implementing and the potential for negative effects in their absence are noted at this stage. Supporting policy requirements will reduce the extent of these effects. In terms of ranking the Options, given the proximity of Option I to the River Wye SAC/ SSSI and the Wye Valley Woodland SAC/ SSSI/ National Nature Reserve, and the biodiversity present at the Option itself, Option I is worst performing overall.
- 2.72 All Options are also constrained in terms of internationally/ nationally/ designated assets/ sites under the Landscape and Historic Environment ISA themes. As above in relation to biodiversity, Option I is worst performing against the Historic Environment ISA theme as there are numerous heritage assets present in close proximity to the Option (Monmouth (Dixton) Conservation Area to the south east of the Option (which contains two scheduled monuments and five listed buildings), and the listed buildings to the north west of the Option on the other side of the A466).
- 2.73 Options I and J perform equally against the Landscape ISA theme given both are identified as having high/medium sensitivity to residential development, and both are constrained by landscape designations (Option I is located adjacent to a Landscape of Outstanding or Special Historic Interest, while Option H is designated in the current adopted LDP as an 'Area of amenity importance').
- 2.74 The overall significance of effects against the Biodiversity, Landscape and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. Specifically, in relation to the emerging issue of nutrient neutrality in the River Wye SAC, Natural Resources Wales and Natural England advise that all residential development coming forward in the hydrological catchment of these riverine SACs will have to be phosphorus neutral and supported by nutrient budgets. It is also noted that there is the potential for positive effects to be delivered, i.e., through improved accessibility to, and enhancement of, designated assets.
- 2.75 For all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

## Sevenside

- **Option J:** Land north-east of Caldicot.
- **Option K:** Land north-west of Caldicot.
- **Option L:** Land west of Caldicot/ east of Rogiet; and
- **Option M:** Land east of Caerwent.

**Figure 2.4: Strategic growth options in Severnside**



**Table 2.7: Summary findings for Severnside strategic growth options**

| ISA theme                                   | Rank/<br>Significant effects | Option J       | Option K       | Option L       | Option M       |
|---|------------------------------|----------------|----------------|----------------|----------------|
| Economy and employment                      | Rank                         | 2              | 2              | 1              | 3              |
|   | Significant effect?          | No             | No             | No             | No             |
| Population and communities                  | Rank                         | 1              | 2              | 1              | 3              |
|   | Significant effect?          | Yes - Positive | Yes - Positive | Yes - Positive | Yes - Positive |
| Health and wellbeing                        | Rank                         | 2              | 2              | 1              | 3              |
|   | Significant effect?          | No             | No             | No             | No             |
| Equalities, diversity, and social inclusion | Rank                         | 2              | 3              | 1              | 4              |

| ISA theme                             | Rank/<br>Significant<br>effects | Option J       | Option K       | Option L       | Option M       |
|---------------------------------------|---------------------------------|----------------|----------------|----------------|----------------|
|                                       | Significant effect?             | No             | No             | No             | No             |
| Transport and movement                | Rank                            | 2              | 2              | 1              | 3              |
|                                       | Significant effect?             | No             | No             | No             | No             |
| Natural resources                     | Rank                            | 2              | 2              | 1              | 2              |
|                                       | Significant effect?             | Yes - Negative | Yes - Negative | Yes - Negative | Yes - Negative |
| Biodiversity and geodiversity         | Rank                            | 3              | 2              | 3              | 1              |
|                                       | Significant effect?             | Uncertain      | Uncertain      | Uncertain      | Uncertain      |
| Historic environment                  | Rank                            | 3              | 2              | 1              | 2              |
|                                       | Significant effect?             | Uncertain      | Uncertain      | No             | Uncertain      |
| Landscape                             | Rank                            | 3              | 3              | 2              | 1              |
|                                       | Significant effect?             | Yes - Negative | Yes - Negative | Uncertain      | Uncertain      |
| Climate change (including flood risk) | Rank                            | 1              | 1              | 3              | 2              |
|                                       | Significant effect?             | Uncertain      | Uncertain      | Uncertain      | Uncertain      |

2.76 All Options perform positively against the Population and Communities, Health and Wellbeing, Equalities, Diversity and Social Inclusion, and Transport and Movement ISA themes, given Options have good to reasonable access to services and facilities throughout the Severnside area (notably Caldicot town centre), and access to the strategic transport network. Options have the potential to capitalise upon sustainable travel opportunities in the key Severnside settlements (namely Caldicot and the Severn Tunnel Junction rail station in Rogiet), in addition to utilising the M4 corridor. This will provide access to wider employment markets, including opportunities associated with the Cardiff Capital Region City Deal and the South East Wales Metro. While positive effects are anticipated through all Options, Option M performs least well of the Options given its comparatively poor access to Severnside centres,

services and facilities, and relatively limited potential to capitalise upon the strategic road network.

- 2.77 In terms of differentiating between Options J-L for the above ISA themes, Option L is best performing given its location along the M4 corridor, nestled between Caldicot and Rogiet, and its ability to capitalise upon sustainable transport infrastructure and encourage modal shift. Option J and K perform relatively on a par, given reasonable access to services, facilities, and the strategic road network/ sustainable transport opportunities.
- 2.78 All Options perform negatively against the Natural Resources ISA theme given all Options would result in the loss of greenfield and BMV agricultural land and would not contribute towards promoting the use of brownfield land. However, it is recognised that there are limited opportunities within the County for brownfield development and development on lower grades of agricultural land. Option L is best performing against this ISA theme as it is well located in terms of potential to utilise sustainable travel and improve air quality; is the least constrained in terms of Grade 1 agricultural land coverage.
- 2.79 In terms of the Biodiversity, Landscape, and Historic Environment ISA themes; Options are constrained in terms of internationally/ nationally/ designated assets/ sites, with the potential for significant long term negative effects. Options J and L are worst performing against the Biodiversity ISA theme given the presence of the Severn Estuary SPA/ SAC/ Ramsar site/ SSSI within 900m and 1.2km of the Options, respectively. Option M is identified as best performing, given it is the least constrained of the Options in terms of potential impact on biodiversity designated sites, and overall biodiversity value.
- 2.80 Option J is also worst performing against the Historic Environment ISA theme given it may lead to some development within the Caldicot Conservation Area, which also contains Caldicot Castle Grade I listed building and Scheduled Monument; and would result in the loss of large areas of greenfield/ open space in the setting of the castle which is also a Country Park. Option L is the least sensitive in terms of the historic environment. Options J and K are worst performing in terms of landscape, given both have been identified through the Landscape Sensitivity Update Study (2020) as having 'medium-high sensitivity for housing development. Option K would extend development northwest of the M48 into the open landscape; while Option J would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and extend development north of the Caldicot Castle Country Park (which is also a conservation area). Option L has medium sensitivity to residential development, and may lead to coalescence between Caldicot and Rogiet, resulting in the loss of a multi-functional open space and designated 'Green Wedge'. Option M is best performing in this respect, although there remains the potential for residual minor negative effects.
- 2.81 The potential for Options to lead to significant effects against the Biodiversity, Landscape, and Historic Environment ISA themes is uncertain at this stage and will be dependent on the design/ layout and implementation of specific mitigation measures. It is also noted that there is the potential for positive effects to be delivered, i.e., through biodiversity net-gain, and the enhancement of designated assets.

2.82 Option L is worst performing of the Options in relation to the Climate Change ISA theme, given that a significant proportion of Option L is located within Flood Zones B/C, with the potential for long term negative effects. However as above, for all Options, effects against Climate Change are uncertain at this stage. Uncertainty could be reduced by supporting policy mitigation.

## 3. Developing the preferred strategy

- 3.1 This Chapter presents the Council's response to the alternatives appraisal and the Council's reasons for selecting its preferred approach in light of alternatives appraisal and other factors.

### The Council's outline reasons for choosing the preferred strategy

#### Preferred growth and spatial option

- 3.2 The options appraisal concluded that Growth Option 2 and Spatial Option 2 combined were the most appropriate options for the 2022 Preferred Strategy and Deposit Plan.
- 3.3 While Growth Option 2 reduces the level of growth proposed compared to the 2021 Preferred Strategy it is considered the best option to respond to challenges, namely the Welsh Government objection to the level of growth set out in the 2021 Preferred Strategy, whilst also ensuring that the RLDP delivers on the Council's objectives and addresses the core issues of delivering much needed affordable housing at pace and scale, responding to the climate and nature emergency by delivering zero carbon ready new homes for our communities, and ensuring our communities are socially and economically sustainable. Similarly, Spatial Option 2 would address our locally evidence-based issues and objectives including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergency, and as such is considered the most appropriate spatial strategy option.
- 3.4 The Preferred Growth Strategy is based on a demographic-led scenario with added policy assumptions<sup>7</sup>. It provides a level of growth (homes and jobs) that maximises the extent to which we address our local evidence-based issues, including in relation to the delivery of affordable homes, sustainable economic growth, rebalancing our demography by ensuring that young people can choose to live in the County while responding to the climate and nature emergency. The ISA analysis identifies that Growth Option 2 performs slightly less positively than Growth Option 1 given the level of growth proposed is less, however similar positive effects are predicted under this option. This growth option performs well against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities as the additional growth provides an opportunity to deliver a range of new housing, employment opportunities and community infrastructure to meet the needs of the County providing a more balanced demographic and sustainable communities. While Growth Option 1 is identified as best performing against ISA themes relating to the economy and employment, population and communities, health/wellbeing and equalities it performs least favourably against ISA themes relating to Natural Resources, Biodiversity and Geodiversity, Historic Environment and Landscape. In addition, Welsh Government raised significant concerns in relation to this Growth Option

<sup>7</sup> Demographic-led option for the LPA area (i.e. excludes the BBNP area within Monmouthshire) using ONS 2020 MYE base and applying assumptions in relation to migration, household membership rates and commuting ratio, as set out in the Housing Background Paper.



suggesting the level of growth in Monmouthshire would undermine growth in the national growth area of Cardiff, Newport and the Valleys and as a result would not be in general conformity with policies 1 and 33 of Future Wales: the National Plan 2040. Growth Option 1 has therefore been discounted. Further to this, Growth Option 3 performs negatively to RLDP objectives relating to Economic Growth/Employment, Demography, Housing, Place-making, Communities, Rural Communities, Infrastructure and Accessibility. It is also noted for potential negative effects in relation to the ISA themes of economy and employment, population and communities, health and wellbeing, and equalities, diversity, and social inclusion. Option 3 would not deliver on the Council's core objectives of delivery of affordable housing and rebalancing our demography and has subsequently been rejected. For further details on Growth Options 1 and 3 refer to the Growth and Spatial Strategy Options Appraisal as set out in Appendix 1.

3.5 Spatial Option 2 and Spatial Option 1 perform positively against ISA themes, in relation to population/ communities, health/ wellbeing, economy/ employment, and equalities. The Preferred Growth and Spatial Option would best achieve sustainable balanced deliverable outcomes by:

- Delivering a level of growth (homes and jobs) that addresses our locally evidence-based issues and objectives, including in relation to the delivery of affordable homes, rebalancing our demography and responding to the climate and nature emergencies, whilst having regard to WG officer concerns regarding alignment with Future Wales: The National Plan 2040.
- Maximising affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 50% affordable homes on new housing sites which would help to tackle Monmouthshire's housing need, homelessness, and social inequality. This approach would also enable the Council to consider alternative mechanisms for delivering affordable homes.
- Providing a wider choice of smaller homes to enable younger people to live and work in Monmouthshire which would make our ageing communities more socially and economically sustainable.
- Requiring new homes to be net zero carbon, reflecting our commitment to responding to and tackling climate change.
- Delivering growth in our most sustainable settlements. This would limit the impacts of climate change and ensure good placemaking principles of attractive, accessible places to live and work that have access to sustainable transport links and reduce the need for journeys by the car.
- Promoting sustainable economic growth by providing policy support to enable and facilitate home/remote working, enabling economic growth through supporting the delivery of the priorities and aims identified in the Council's Economy, Employment and Skills Strategy and climate emergency declaration, maximising opportunities from Cardiff Capital Region City Deal, targeting growth in key economic sectors and providing appropriate employment land in the right locations.

3.6 Overall, it is considered that the Deposit Plan, based on the above preferred growth and spatial options, strikes a compromise between achieving our local evidence-based objectives that underpinned the Preferred Strategy consulted

upon in July 2021 and the Welsh Government's response which objected to the level of growth proposed. In response, the Deposit Plan proposes a lower level of growth that responds to these challenges.

## Preferred Strategic Site Allocations

- 3.7 The Preferred Strategic Site Allocations have been selected from a total of 13 Strategic Growth Options located across Abergavenny, Chepstow, Monmouth and Severnside that were previously consulted on in the 2021 and 2022 Preferred Strategy. Site selection has been informed by the assessment of candidate sites and the consultation responses received.
- 3.8 As part of the consultation in July 2021, preferences were cast by members of the public using 'Placecheck'. Although it was made clear at that time that this was not part of the formal consultation, the results provide a helpful indication of public opinion. A total of 3,179 preferences were cast in the process. Table 7.1 below provides further detail. The four Preferred Strategic Site Allocations identified in the Deposit Plan are highlighted.

**Table 3.1: Strategic site options**

| SEA option    | Strategic growth area                    | Up votes | Down votes |
|---------------|--|----------|------------|
| Abergavenny A | Land north of Abergavenny                | 54       | 184        |
| Abergavenny B | Land to the east of the A465             | 191      | 23         |
| Abergavenny C | Land between the B4246                   | 107      | 47         |
| Chepstow D    | Land north of the Bayfield Estate        | 51       | 132        |
| Chepstow E    | Land between the Bayfield Estate and A48 | 43       | 143        |
| Chepstow F*   | Land between the A48 and M48             | 60       | 143        |
| Monmouth G    | Land west of Monmouth                    | 270      | 175        |
| Monmouth H    | Land central Monmouth                    | 255      | 189        |
| Monmouth I    | Land north east Monmouth                 | 318      | 248        |
| Severnside J  | Land north east of Caldicot              | 74       | 72         |
| Severnside K  | Land north west of Caldicot              | 48       | 85         |
| Severnside L  | Land west of Caldicot/ east of Rogiet    | 57       | 100        |
| Severnside M  | Land east of Caerwent                    | 59       | 51         |

\*Site/ Option F is no longer being put forward for development by the site promoter

- 3.9 The reasons for selection of sites are set out below:

### Land to the East of Abergavenny (Option B)

- 3.10 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the built-up area of the town beyond the A465 which currently forms a hard development boundary to the town. The site has the potential to form a well-connected urban extension to Abergavenny and provides the opportunity to provide a mixed-use

development, containing a mix of residential uses alongside employment/commercial uses, facilities and services.

- 3.11 The proximity of the area to Abergavenny Railway Station (currently an approximately 10-minute walk, 0.5 miles) offers significant benefits to maximise opportunities for a modal shift to more sustainable forms of transport and offers an opportunity for transit-oriented development. The site is just an approximate 16-minute walking distance from the town centre (0.7 miles). Vehicular access would be required from the A465 trunk road. The site has potential to offer park and ride facilities for Abergavenny train station, helping address an existing problem and supporting future modal shift alongside the increased train service frequency proposed as part of the South Wales Metro proposals.
- 3.12 The land is categorised as having high/medium landscape sensitivity to residential development in the Landscape Sensitivity Update. The site is mostly located on an area of predictive grade 2/3a BMV agricultural land. However, when considering the search sequence recommended in PPW12 it is noted that most of the land surrounding Abergavenny is either of BMV status or within floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Development will need demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body of the River Usk SAC catchment area.
- 3.13 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

### **Land at Mounton Road, Chepstow (Option E)**

- 3.14 The Bayfield Site has not progressed to the Deposit Plan. In October 2023 a report of post consultation Preferred Strategy changes was agreed by Council. This included swapping the strategic site in Chepstow from Bayfield to Land at Mounton Road on the basis that a mixed-use development that includes a care home and proposed hotel had associated job creation and tourism benefits.
- 3.15 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would expand the existing built-up area west of the A466 (St Lawrence Road), north of the A48 and south of Mounton Road. The site is near the Wye Valley National Landscape (AONB) and on the opposite side of the road to the Mathern Conservation Area. PPW gives National Parks and AONBs equal status in terms of landscape and scenic beauty and requires that both be afforded the highest status of protection from inappropriate developments. Development in this location would need to be carefully designed to ensure that any effects on the setting of the National Landscape are acceptable. The land is categorised as being of high/medium landscape sensitivity to residential development.
- 3.16 The site is approximately 0.9 miles or an approximate 15-minute walking distance from the town centre and Bulwark neighbourhood centre, 0.9 miles (approximately 17-minute walk) from Chepstow Comprehensive School and Leisure Centre, and 1.1 miles (approximately 9-minute walk) from Chepstow railway station. As outlined above, careful consideration will be required regarding the cumulative impact of development on the A466, A48 and Highbeech roundabout.

- 3.17 Circa 72% of the land is predictive grade 2 and 3a BMV agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Chepstow is either of BMV status or affected by other constraints. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development. Another consideration will include its location in the limestone minerals safeguarding area.

### **Leasbrook, Monmouth (Option I)**

- 3.18 The preferred strategic site allocation in Monmouth relates to a greenfield site to the north-east of Monmouth. The site is a sustainably located edge of settlement site north of Dixon Road. The site is located adjacent to existing development at Dixon Close and Hereford Road, including Haberdashers' Monmouth School's playing pitches to the west, along with agricultural land to the east and north.
- 3.19 Monmouth sits within the River Wye Special Area of Conservation (SAC) catchment area. The strategic site will therefore need to demonstrate phosphate neutrality or betterment in its design and/or its contribution to the water body. A strategic solution to phosphates at the Monmouth Wastewater Treatment Works has been identified by Dŵr Cymru Welsh Water which should be implemented by 31st March 2025.
- 3.20 The site is near the Dixon Roundabout offering good links to locations further afield when public transport and use of the private car is necessary. There is no rail network to encourage sustainable travel by rail, the need to reduce travel/carbon and support active travel options is of importance.
- 3.21 Regarding agricultural land, the site contains a small amount of Grade 2 land with most of the site Grade 3a with Grade 3b. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Monmouth is of BMV status. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.
- 3.22 As a small part of the main access point of the site is located in floodplain, an emergency access will be included to ensure an alternative route in any extreme flooding events on Dixon Road. The site is located within proximity to two Special Areas of Conservation and adjoins the Dixon Conservation Area with a very small portion of the site being located in the Lower Wye Valley Landscape of Historic Interest.
- 3.23 In terms of distance to Monmouth Town Centre the site is located approximately 0.6 miles/13-minutes from the Town Centre with the whole Town Centre being located within 0.9 miles and an 18-minute walk. The site is in very close proximity to Monmouth Comprehensive School 0.4miles/ 7-minutes and the Leisure Centre 0.6miles/ 12-minutes (using the public entrance/route).

### **Land to the East of Caldicot (Option J)**

- 3.24 The preferred strategic site allocation is a sustainably located edge of settlement site. Development here would extend the settlement of Caldicot to the northeast, towards the settlement of Crick and adjacent to the adopted LDP

Crick Road, Portskewett site. The site is north of the Caldicot Castle Country Park, a Conservation Area and an area currently designated as an Area of Amenity Importance under the Adopted LDP.

- 3.25 A small part of the candidate site adjacent to the former railway line is in the floodplain: built development would not be permitted within this part of the site. Part of the site includes previously developed land comprising a commercial equestrian centre, with much of the remainder being on Council-owned land. The inclusion of such suitable land is supported by Future Wales Policy 3 which supports public leadership and the use of public land to deliver on ambitious affordable housing targets.
- 3.26 In terms of agricultural land, the site contains a small area of grade 1 agricultural land, most of which is within a floodplain so would not be built on. The remaining area is classified predominantly as grade 2 agricultural land. However, when considering the search sequence recommended in PPW it is noted that most of the land surrounding Caldicot is either of BMV status or floodplain. Moreover, the County's primary settlements are surrounded by either BMV land or flood plain meaning an alternative spatial strategy would not avoid allocating BMV land for development.
- 3.27 In terms of distance from Caldicot town centre, it is approximately 1.2 miles (from a central point of the growth area) and approximately 22-minutes walking distance. It is approximately a 33-minute walk from Caldicot railway station. The former railway line has recently been purchased by MCC and is being turned into an active travel route, offering a significant benefit in terms of modal shift and leisure provision. Landscape sensitivity to residential development is high/ medium. Part of this site is within the limestone minerals safeguarding area.
- 3.28 This allocation could helpfully identify the long-term direction of growth for the town. This longer-term potential is advantageous.

## **Part 2: What are the ISA findings at this stage?**

## 4. Appraisal findings at this stage

- 4.1 Part 2 of the ISA Report and this NTS answers the question - what are appraisal findings at this stage? - by presenting an appraisal of the Preferred Strategy Document. Summary findings of the appraisal are presented below.
- 4.2 **Table 4.1** overleaf sets out a summary of the appraisal findings against each ISA theme. At this later stage of plan-making no recommendations are identified, recognising that earlier iterations of the ISA have informed plan development.

**Table 4.1: Summary of the appraisal findings**

| ISA theme                                   | Conclusion  |
|---|---|
| Economy and employment                      | Overall, the employment land protections and provisions, alongside well-connected housing and town / local centre development are considered likely to lead to <b>significant positive effects</b> for this ISA theme. Additional provisions that seek to improve the local environment and sustainable and active travel connections will also bolster positive effects and support the rural economy and tourism growth.  |
| Population and communities                  | Considering the above, it is anticipated that implementation of the RLDP will likely lead to <b>significant positive effects</b> . This is due to its support of building sustainable and resilient communities across Monmouthshire and tackling the affordable housing challenge. This also reflects the focus of the RLDP on bringing forward different housing development (various types and tenures) in well-connected areas to meet the varying needs of the population.   |
| Health and wellbeing                        | Overall, it is considered that the RLDP will have <b>significant positive effects</b> on the health and wellbeing of Monmouthshire's population. This is through supporting development within proximity to key services and facilities in the higher tier settlements of Monmouth, Abergavenny, Chepstow and Caldicot. It also reflects the focus of the wider policies on bringing forward new infrastructure to support physical and mental health, for example green and blue infrastructure. This will ensure a continued high-quality service of resources in Monmouthshire.  |
| Equalities, diversity, and social inclusion | Considering the above, it is anticipated that <b>significant positive effects</b> will come forward as a result of the RLDP for this ISA theme. This is due to the focus on protecting existing and supporting new infrastructure in the neighbourhood area, thereby safeguarding, and improving access to important services and facilities. It also reflects policy requirements for development that promotes accessible and inclusive places. The strategic allocations for housing development also contribute to equalities, diversity, and social inclusion – linked to their ability to provide a significant number of affordable houses that are supported by existing infrastructure within the primary settlements. |

| ISA theme   | Conclusion  |
|---|---|
| Transport and movement                            | <p>Considering the above, <b>significant positive effects</b> are concluded likely for the transportation and movement ISA theme under the RLDP. This reflects the focus on bringing forward strategic allocations in settlements with a good distribution of services and facilities and transportation infrastructure.</p> <p>Furthermore, there is a focus on prioritising existing public rights of way and active transportation infrastructure and enhancing the network where appropriate. This will likely contribute to reducing the reliance on private vehicles to move around the area and will help support the transportation network in Monmouthshire.</p>               |
| Natural resources (air, land, minerals and water) | <p>In summary, the plan includes a good level of provision for mineral safeguarding and water quality and works well to reduce impacts on air quality. However, it is noted there is a need to conserve greenfield sites. It is recognised there are limited brownfield opportunities within Monmouthshire, and the plan works well to allocate strategic sites within settlement boundaries and adjacent to built up areas. However, at this time, <b>significant negative effects</b> are concluded likely for the impact on natural resources, due to the substantial (and unavoidable) loss of greenfield and agricultural land.</p>  |
| Biodiversity and geodiversity                     | <p>Considering the above and with nutrient neutrality solutions now in place, <b>minor positive effects</b> are considered most likely for the biodiversity and geodiversity ISA theme under the RLDP. This is due to the policy framework avoiding adverse impacts on important sites for biodiversity, and the focus of the plan on bringing forward net gains and improving ecological connectivity.</p>   |
| Historic environment                              | <p>At this time, <b>minor negative effects</b> are concluded most likely under the RLDP for this ISA theme. This reflects the proximity of site allocations to heritage features, and their potential to impact upon the historic environment where the design and layout of development will be crucial to minimise negative effects, as guided by the Deposit Plan policies. There are also notable policy provisions included under the RLDP, which will directly and indirectly benefit the historic environment by protecting specific features and enhancing the wider setting they are located within.</p>   |
| Landscape   | <p>At this time, <b>minor negative effects</b> are considered most likely in relation to the landscape ISA theme. Whilst development will impact upon landscape character and quality in Monmouthshire, the RLDP works well to reduce this impact by allocating sites within settlement boundaries and outside of landscape designations. Furthermore, the development policies and wider policy provisions under the RLDP work to maintain and enhance landscape character and quality – for example, through green infrastructure provision and resisting development in the open countryside. Despite this, considerable greenfield loss will impact the landscape cumulatively.</p> |



| ISA theme                             | Conclusion  |
|---------------------------------------|---|
| Climate change (including flood risk) | <p>At this time, <b>neutral effects</b> are considered most likely in relation to climate change adaptation. This reflects the allocation of strategic sites at little to no risk of flooding. This conclusion is also based on the policy provisions of the RLDP, including those under Strategic Policy S4 (Climate Change), which seek to reduce flood risk across Monmouthshire.</p> <p>In terms of climate change mitigation, <b>minor negative effects</b> are concluded most likely at this time. Though the RLDP includes policy stipulations to help reduce emissions (including active and public transportation, green infrastructure provision, and encouraging containment within settlements), the level of growth proposed through the housing policies is significant and will increase emissions across Monmouthshire.</p> |

## **Part 3: What happens next?**

## 5. Next steps and monitoring

5.1 Part 3 of the SA Report and this NTS explains the next steps in the plan-making/ SA process.

### Next steps

5.2 This ISA Report will accompany the Deposit Plan for public consultation. Any comments received will be reviewed and considered as part of the iterative plan-making and ISA process and inform the submission RLDP.

### Monitoring

5.3 **Table 5.1** below outlines the proposed monitoring for the RLDP. This will be refined in the ISA Adoption Statement.

**Table 5.1 Proposed ISA monitoring programme for the RLDP**

| ISA theme                                   | Proposed monitoring measure   |
|---|---|
| Economy and employment                      | <ul style="list-style-type: none"> <li>• Overall employment and unemployment rate.</li> <li>• Net additional employment floorspace.</li> <li>• Net additional floorspace of commercial development by location.</li> <li>• Net improved quality employment floorspace.</li> <li>• Annual tourism income.</li> <li>• Net additional tourism development by location and type.</li> </ul>   |
| Population and communities                  | <ul style="list-style-type: none"> <li>• Five-year housing land supply.</li> <li>• Number of pitches for travellers and travelling showpeople provided.</li> <li>• Regular updates to the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment.</li> <li>• Number of affordable homes completed in the reporting year.</li> <li>• Number of homes completed by type and bedroom size in the reporting year.</li> <li>• Number of homes completed providing specialist accommodation in the reporting year.</li> <li>• Number of self-build/ custom build homes completed in the reporting year.</li> </ul> |
| Health and wellbeing                        | <ul style="list-style-type: none"> <li>• Area of new accessible natural spaces provided through development proposals.</li> <li>• Areas of improved access to natural green spaces provided through development proposals.</li> <li>• New active travel connections by location.</li> <li>• Loss/ gain of public open space by type. For example, park, children's playground, allotments.</li> </ul>   |
| Equalities, diversity, and social inclusion | <ul style="list-style-type: none"> <li>• Indices of multiple deprivation scorings.</li> </ul>   |

| ISA theme  | Proposed monitoring measure  |
|--|--|
| Transport and movement                             | <ul style="list-style-type: none"> <li>• Road junction improvements.</li> <li>• Improvements in accessibility scoring by location for walking and cycling.</li> <li>• Improvement in public transport networks.</li> <li>• Transport Plans agreed by location and land use type.</li> <li>• Additional kilometres of Public Rights of Way.</li> </ul>  |
| Natural resources (air, land, minerals, and water) | <ul style="list-style-type: none"> <li>• Continued air quality monitoring data at air quality monitoring locations.</li> <li>• AQMA revocations.</li> <li>• Area of contaminated land remediated in reporting year.</li> <li>• Number and location of schemes implemented with sustainable drainage serving existing as well as new development.</li> <li>• Number and location of development including watercourse re-naturalisation or flood storage areas.</li> <li>• Number and location of development schemes affecting mineral safeguarding areas.</li> <li>• Area and location of brownfield redevelopment in the reporting year.</li> <li>• Loss of agricultural land by grade.</li> <li>• Area of greenfield development in the reporting year.</li> <li>• Number and location of developments contributing to maintenance of water infrastructure.</li> <li>• Number and location of non-domestic schemes achieving a reduction in water usage over the baseline.</li> </ul> |
| Biodiversity and geodiversity                      | <ul style="list-style-type: none"> <li>• Action Plan targets that monitor and manage the impacts of growth on internationally designated sites (SACs/ SPAs/ Ramsar)</li> <li>• Net gains/ losses of buffer land and alternative green space by function that reduce pressures of growth designated sites.</li> <li>• Net gain/ loss of habitat arising from development proposals.</li> <li>• New linkages between habitats by location.</li> </ul>  |
| Historic environment                               | <ul style="list-style-type: none"> <li>• Number, type, and location of approved development impacting on a heritage asset.</li> <li>• Number of heritage assets improved and raised out of the 'at risk' category.</li> </ul>  |
| Landscape  | <ul style="list-style-type: none"> <li>• Positive landscape impact assessments on proposals approved.</li> <li>• Negative landscape impact assessments on proposals refused.</li> </ul>  |
| Climate change (including flood risk)              | <ul style="list-style-type: none"> <li>• New developments containing electric vehicle charging points by land use type.</li> <li>• Number, location, and type of proposals achieving low carbon design.</li> </ul>   |

**ISA theme****Proposed monitoring measure**

---

- Number of decentralised low carbon and renewable energy schemes approved in development.
  - Approvals of development in Flood Risk Zones 2, 3a, and 3b by use class and flood risk compatibility.
  - Refusals of development in Flood Risk Zones 2, 3a, and 3b.
-

